

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LYDIA GARCIA, Individually and On Behalf	:	Civil Action No. 04-CV-8807
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
JAKKS PACIFIC, INC., et al.,	:	
	:	
Defendants.	:	
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QUANTUM EQUITIES LLC, Individually and	:	Civil Action No. 04-CV-8877
On Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
JAKKS PACIFIC, INC., et al.,	:	
	:	
Defendants.	:	
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[Caption continued on following page.]

NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

JAMES T. KAHN, On Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., et al.,

Defendants.

JONCO INVESTORS, LLC, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., et al.,

Defendants.

JAMES IRVINE, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., et al.,

Defendants.

X

Civil Action No. 04-CV-8910

CLASS ACTION

Civil Action No. 04-CV-9021

CLASS ACTION

Civil Action No. 04-CV-9078

CLASS ACTION

X

PLEASE TAKE NOTICE that class member Indiana Electrical Workers Pension Trust Fund IBEW (“Indiana Electrical Workers”), will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Indiana Electrical Workers as Lead Plaintiff; (iii) approving Indiana Electrical Workers’ selection of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Indiana Electrical Workers submits herewith a Memorandum of Law and Declaration of Mario Alba Jr. dated January 4, 2005.

DATED: January 4, 2005

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN (SR-7957)
DAVID A. ROSENFELD (DR-7564)
MARIO ALBA JR. (MA-7240)

/s/ Mario Alba Jr.
MARIO ALBA JR.

200 Broadhollow Road, Suite 406
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

[Proposed] Lead Counsel for Plaintiffs

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LYDIA GARCIA, Individually and On Behalf	:	Civil Action No. 04-CV-8807
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
JAKKS PACIFIC, INC., et al.,	:	
	:	
Defendants.	:	
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QUANTUM EQUITIES LLC, Individually and	:	Civil Action No. 04-CV-8877
On Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
JAKKS PACIFIC, INC., et al.,	:	
	:	
Defendants.	:	
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[Caption continued on following page.]

[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD
PLAINTIFF AND APPROVING SELECTION OF LEAD COUNSEL

	X	
JAMES T. KAHN, On Behalf of Himself and	:	Civil Action No. 04-CV-8910
All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
JAKKS PACIFIC, INC., et al.,	:	
	:	
Defendants.	:	
	:	
JONCO INVESTORS, LLC, Individually and	:	Civil Action No. 04-CV-9021
On Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
JAKKS PACIFIC, INC., et al.,	:	
	:	
Defendants.	:	
	:	
JAMES IRVINE, Individually and On Behalf	:	Civil Action No. 04-CV-9078
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
JAKKS PACIFIC, INC., et al.,	:	
	:	
Defendants.	:	
	:	
	X	

Having considered the motion of Indiana Electrical Workers Pension Trust Fund IBEW (“Indiana Electrical Workers”) for Consolidation, Appointment As Lead Plaintiff And Approval Of Selection of Lead Counsel and the Memorandum of Law and Declaration of Mario Alba Jr., in support thereof, and good cause appearing therefor:

1. The Actions are hereby consolidated;
2. Indiana Electrical Workers is hereby appointed Lead Plaintiff for the Class pursuant to Section 21D of the Securities Exchange Act of 1934; and
3. The law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP is hereby appointed Lead Counsel.

SO ORDERED THIS ____ day of _____, 2004.

U.S. District Judge

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